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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ERICA FRASCO, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,  
FACEBOOK, INC., APPSFLYER, INC., and  
FLURRY, INC.,

Defendants.

Case No.: 3:21-cv-00757-JD

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING THE DEADLINE  
FOR FLO HEALTH, INC. TO RESPOND  
TO ECF No. 179**

SARAH WELLMAN, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,  
FACEBOOK, INC., APPSFLYER, INC., and  
FLURRY, INC.,

Defendants.

STIPULATION AND [PROPOSED] ORDER EXTENDING THE DEADLINE FOR FLO HEALTH, INC. TO  
RESPOND TO ECF No. 179

Case No. 3:21-cv-00757-JD

JUSTINE PIETRZYK, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,  
FACEBOOK, INC., APPSFLYER, INC., and  
FLURRY, INC.,

Defendants.

JENNIFER CHEN, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,  
FACEBOOK, INC., APPSFLYER, INC., and  
FLURRY, INC.,

Defendants.

TESHA GAMINO, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,  
FACEBOOK, INC., APPSFLYER, INC., and  
FLURRY, INC.,

Defendants.

1 LEAH RIDGWAY and AUTUMN MEIGS,  
2 individually and on behalf of all others similarly  
3 situated,

4 Plaintiff,

5 v.

6 FLO HEALTH, INC., GOOGLE, LLC,  
7 FACEBOOK, INC., APPSFLYER, INC., and  
8 FLURRY, INC.,

9 Defendants.

10 MADELINE KISS, individually and on behalf of  
11 all others similarly situated,

12 Plaintiff,

13 v.

14 FLO HEALTH, INC., GOOGLE, LLC,  
15 FACEBOOK, INC., APPSFLYER, INC., and  
16 FLURRY, INC.,

17 Defendants.

Flo Health, Inc. (“Flo”) and Plaintiffs Erica Frasco, Sarah Wellman, Justine Pietrzyk, Jennifer Chen, Tesha Gamino, Leah Ridgway, Autumn Meigs, and Madeline Kiss (collectively “Plaintiffs”), together (the “Parties”), by and through their counsel, hereby stipulate to the following:

WHEREAS, the Parties conducted a video meet and confer on August 5, 2022 regarding the selection of Flo Health, Inc. custodians.

WHEREAS, on August 25, 2022, Plaintiffs filed a Discovery Letter Brief, ECF No. 179, asking the Court to “compel Defendant Flo Health, Inc. (“Flo”) to produce documents and information regarding potential custodial sources,” as requested in Plaintiffs’ Second Set of Requests for Product Request No. 1, served on September 28, 2021, and “include custodians proposed by Plaintiffs in its custodial search.”

WHEREAS, on September 13, 2022, the Parties conducted an additional meet and confer to discuss potential custodians.

WHEREAS, in addition to video meet and confers, the Parties have exchanged letters and emails regarding potential custodians.

WHEREAS, on September 19, 2022, Flo Health, Inc. agreed to produce documents responsive to RFP No. 1 in Plaintiffs’ Second Set of Requests for Production that are readily accessible and do not require custodians and search terms by Thursday, September 22, 2022.

WHEREAS, the Parties are hopeful that they can reach an agreement that resolves the issues outlined in ECF No. 179, and therefore are seeking more time to negotiate such an agreement.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, among the undersigned Parties, and respectfully submitted for the Court’s approval, as follows:

1. Flo Health, Inc. shall have until September 22, 2022 to respond to ECF No. 179.

**IT IS SO STIPULATED.**

Dated: September 19, 2022

/s/ Carol C. Villegas  
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